IN THE UNITED STATES DISTRICT COURT SOUTHERN DISTRICT OF OHIO EASTERN DIVISION

ROOT, INC., *et al.*, : Case No. 2:23-cv-00512-SDM-CMV

Plaintiffs, : Judge Sarah D. Morrison

Magistrate Judge Chelsey M. Vascura

V.

BRINSON CALEB SILVER, et al.,

:

Defendants.

:

AGREED MOTION FOR EXTENSION OF TIME TO OPPOSE MOTION TO DISMISS (ECF NO. 94)

Plaintiffs, Root, Inc., Caret Holdings, Inc. and Root Insurance Agency, LLC (collectively "Root") respectfully move this Court for a fourteen (14) day extension of time to file an opposition to the Motion to Dismiss (ECF No. 94) filed by Specially Appearing Defendants William Campbell and Quantasy & Associates, LLC (collectively, the "Quantasy Defendants"). Root's opposition is currently due June 1, 2023. The requested extension would move the due date to June 15, 2023. No other extension has been granted to Root. This request is not for the purposes of delay, but so that Root may have adequate time to fully brief the issues raised in the Quantasy Defendants' fifty-four (54) page Motion. Counsel for Root and Counsel for the Quantasy Defendants have conferred regarding this Motion. The Quantasy Defendants do not object and agree to the requested extension of time.

Accordingly, Root and the Quantasy Defendants move for an extension until June 15, 2023 to file a response to the Quantasy Defendant's Motion to Dismiss.

Respectfully submitted,

/s/ William D. Kloss, Jr.

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Damage, LLC

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CERTIFICATE OF SERVICE

I hereby certify that on May 25, 2023, a true and accurate copy of the foregoing was filed electronically. Notice of this filing has been sent to all parties by operation of the Court's electronic filing system. Parties may access this filing through the Court's system.

A copy was also sent by ordinary U.S. Mail, postage prepaid, to the following:

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> <u>/s/ William D. Kloss, Jr</u> William D. Kloss, Jr.

Counsel for Plaintiffs

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[PROPOSED] ORDER GRANTING AGREED MOTION FOR EXTENSION OF TIME TO OPPOSE MOTION TO DISMISS (ECF NO. 94)

This matter is before the Court on Plaintiffs' Agreed Motion for Extension of Time to Oppose Motion to Dismiss (ECF No. 94). For good cause shown, Plaintiff's Motion is **GRANTED**. Plaintiffs shall file their opposition to Defendants William Campbell and Quantasy & Associates, LLC's Motion to Dismiss by June 15, 2023.

IT	TC	SO	ORDERED.	
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UNITED STATES MAGISTRATE JUDGE